## GRONEK & ARMSTRONG

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December 18, 2000

Office of Special Nutritionals (HFS-450) Center for Food Safety and Applied Nutrition Food and Drug Administration 200 C St. SW., Washington, D.C. 20204



Re: Notification for Statements on Dietary Supplement Labels

Dear Sir/Madam:

This firm represents Nature's Sunshine Products, Inc., Provo, Utah, a manufacturer and distributor of dietary supplement products (hereinafter "Nature's Sunshine"). Nature's Sunshine has requested that we notify your Agency on its behalf of the inclusion of statements of nutritional support on its dietary supplement products.

Pursuant to the requirements of Section 6 of the Dietary Supplement Health and Education Act of 1994, 21 U.S.C. §343(r)(6), and in accordance with the authorized provisions of 21 CFR §101.93(a), your Agency is hereby notified that Nature's Sunshine has made statements of "nutritional support", as described in 21 U.S.C. §343(r)(6)(A), for its dietary supplements as follows:

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## Label Statement

Bone/Skin Poultice

Structural System Support. These herbs offer the same features associated with comfrey leaf, and were specifically chosen as an alternative product.

Cascara Sagrada

Intestinal System Support. Encourages Intestinal Contraction; Supports Proper Waste Elimination; Supports Clean Colon.

Chickweed

Urinary and Glandular System Support.

C 6338

975-0162

Chinese Slim-Chi with Synephrine

Herbal Weight Loss Supplement. Synephrine from Immature Orange Peel. Utilize fat stores. Decrease hunger.

Chlorophyll

Intestinal System Support.

CLT-X: Bowel Spasm Formula

Intestinal System Support. Relief of Occasional Intestinal Distress.

Collatrim

Weight Management & Structural System Support. Joint and Skin Health; Weight Management.

Colloidal Minerals; Liquid Trace Minerals 32 fl. oz.

Vital Nutritional Support. Mineral Plant Source; Required by the Cells for Proper Function and Structure.

Digestazyme

Use with Herbal Supplements; Breaks Down Cell Wall for Greater Herb Value.

Chinese Minerals-Chi Tonic

Vital Nutritional and Glandular System Support. Build Physical, Mental, and Emotional Energy; Balance all 12 Acupuncture Meridians; Energize all 5 Chinese Constitutional Types; Nourish Adrenal Glands and Promote Cellular Metabolism. East meets West as Nature's Sunshine combines the finest source of liquid trace minerals (at least 64) with time honored Chinese tonic (adaptogen) herbs. "Light up your energy system" with minerals (essential to every electrochemical reaction in the body) and Chinese tonic herbs (balance the body by acting upon all 12 acupuncture meridians and energizing all 5 constitutional types). Each serving of Mineral-Chi Tonic provides 180mg of potassium to support the adrenal glands (180mg potassium is the same as found in one medium banana or tomato).

Energ-V

Circulatory, Glandular, and Nervous System Support. Promotes Energy; Provides Thyroid and Adrenal Support; Contains Natural Trace Minerals for Enzyme Activation.



Enviro-Detox

Vital Nutritional Support. Supports the Body's Natural Cleansing Functions; Nourishes the Five Main Detoxifying Organs. Environmental pollutants and toxins can build up in the body, slowing the body's natural cleansing process. These herbs were selected for their ability to help support the five primary detoxifying eliminatory organs: liver, kidneys, lungs, bowels, and skin. Enviro-Detox also contains Lactobacillus sporogenes to help keep friendly bacteria in the intestinal tract.

FC with Dong Quai

Glandular System Support. Balancing Formula for Female Reproductive System; Balances the Female Glandular System.

Flora Force

Intestinal System Support. Probiotic Formula; Helps Repopulate Intestinal Tract; Supports Friendly Bacteria.

Focus Attention

Nervous and Circulatory System Support.
Formulated to Help People Focus Attention.
Supports Normal Brain Stimulation Levels.
Supports Blood Circulation and Neurotransmitters in the Brain. Helps Modulate Brain Activity and Energy Levels.

The undersigned hereby certifies on behalf of Nature's Sunshine that the information contained in this correspondence is complete and accurate.

Sincerely yours,

**GRONEK & ARMSTRONG** 

Robert E. Armstrong

PJW:REA:

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CC: Nature's Sunshine Products, Inc.